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**Cc:** [Richard Bergner](#)  
**Subject:** update  
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Gary,

I was in Atlanta last week getting training so here's the update for the last week at the Falcon Refinery. The results of the sludge sampling indicated that much of the sludge had an ignitability of 135 which is below the 140 cut off and the benzene analyses were significantly above the TCLP level for non hazardous. We're in discussions with US Ecology for a strategy to deal with our approximate volume of 825 cubic yards of solids in the tanks.

Each of the tanks has an emulsion, especially Tank 10. We plan to remove the emulsion from the tanks and put the emulsion into tank 7, which already contains several inches of free oil.

Operationally we've discussed how to use the centrifuge to separate the solids, whether we should do one tank at a time or mobilize the centrifuge on all the tanks at once. We have decided to keep the centrifuge at the site and do all the tanks at once. We plan mobilize frac tanks, vacuum trucks, roll off boxes and lots of hose for the removal of the liquids and solids from the tanks.

We are nearly complete with our discharge application for the rainwater disposal.

When we firm up the schedule I'll let you know.

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